

September 22, 2005

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Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Speakeasy Subscriber Acknowledgment Report (September 22, 2005)  
WC Docket No. 05-196

Dear Ms. Dortch:

Attached herewith please find Speakeasy, Inc.'s Subscriber Acknowledgement Report (September 22, 2005), which is being filed in connection with the Public Notice released August 26, 2005 in WC Docket No. 05-196. Please direct any questions regarding this filing to the undersigned.

Sincerely,

Tom Campbell  
Speakeasy Contracts Manager

cc: Byron McCoy  
Kathy Berthot  
Janice Myles  
Best Copy and Printing, Inc.

Speakeasy, Inc.  
Subscriber Acknowledgement Report (September 22, 2005)  
WC Docket No. 05-196

A detailed explanation regarding current compliance with the notice and warning sticker requirements *if* the provider did not notify and issue warning stickers or labels to 100% of its subscribers by the July 29, 2005 deadline. Providers expected to update this information include those that were in the process of providing notice and/or stickers to their subscribers, but had not completed the process by July 29, 2005.

*Speakeasy did notify and issue warning stickers or labels to 100% of its subscribers by the July 29, 2005 deadline.*

A quantification of the percentage of the provider's subscribers that have submitted affirmative acknowledgements as of the date of the September 1 and September 22 reports, and an estimation of the percentage of subscribers from whom the provider does not expect to receive an acknowledgement by September 28, 2005.

*98.6811% of Speakeasy's subscribers have submitted affirmative acknowledgements as of September 22, 2005. Speakeasy expects to receive an acknowledgement from more than 99.995% of its customers by September 28, 2005 (a very limited number, less than .005%, may actively refuse to acknowledge and accept the limitations of VoIP 911).*

A detailed description of any and all actions the provider plans to take towards any of its subscribers that do not affirmatively acknowledge having received and understood the advisory; and,

*Prior to the disconnect date, Speakeasy will contact the remaining customers in question daily for one full week, until 1) they have acknowledged the advisory, 2) have advised that they do not acknowledge and agree to the terms of the advisory or 3) the week has expired. For customers that do not acknowledge and agree to the limitations, or do not respond, Speakeasy will place these customers into a "soft" or "warm" disconnect status as described below.*

A detailed description of any and all plans to use a "soft" or "warm" disconnect (or similar) procedure for subscribers that fail to provide an affirmative acknowledgement by September 28, 2005. The Bureau notes that in their August 10, 2005 reports some providers, such as Telephone, Inc. and Broadview Networks, Inc., state that they will use a "soft" disconnect procedure to disconnect those subscribers that ultimately do not acknowledge having received and understood the customer advisory. As the Bureau understands it, the soft disconnect procedure will either disallow all non-911 calls or intercept and send those calls to the provider's customer service department. Under this "soft" disconnect procedure, however, calls to 911 will continue to go to the appropriate Public Safety Answering Point (PSAP). A provider's September 1 and September 22 reports must include either a statement that the provider will use a "soft" or "warm" disconnect (or similar) solution as of September 28, 2005, or a detailed explanation of why it is not feasible for the provider to use a "soft" or "warm" disconnect solution, as described above.

*Speakeasy intends to use a "soft" or "warm" disconnect procedure to disconnect those subscribers that ultimately do not acknowledge having received and understood the customer advisory. The soft disconnect procedure will either disallow all non-911 calls or intercept and send those calls to Speakeasy's customer service department. Under this "soft" disconnect procedure calls to 911 will continue to go to the appropriate Public Safety Answering Point (PSAP).*